

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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:  
UNITED STATES OF AMERICA :  
:  
:  
- against - : S2 06 Cr. 1179 (RJH)  
:  
: NOTICE OF MOTION  
ALEKSANDER LIPKIN, et al., :  
:  
Defendants. :  
:  
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PLEASE TAKE NOTICE THAT, upon the annexed affirmation of Diarmuid White, Esq., and the previous papers filed and proceedings had heretofore herein, defendant ALEXANDER KAPLAN will move before the Honorable Richard J. Holwell at the federal courthouse located at 500 Pearl Street, New York, New York, at a time and date to be set by the Court, for an order granting the pretrial relief sought in the annexed affirmation, and for such other and further relief as is just and proper.

Dated: New York, New York  
December 19, 2007

Respectfully submitted,

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/s/  
Diarmuid White  
WHITE & WHITE  
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TO: MICHAEL J. GARCIA, United States Attorney  
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Clerk of the Court